# EXHIBIT 4

From: Lindsey.cohan@dechert.com

Sent: Thursday, October 31, 2019 1:10 PM

**To:** Porter, Katherine

Cc: Hurley, Mitchell; Brauner, Sara; Benedict, Kathryn S.; Paul.lafata@dechert.com; Rubin,

Dylan S.; Pera, Michael; Vonnegut, Eli J.; McClammy, James I.; Hayden.Coleman@dechert.com; EXT mleventhal@jha.com; EXT

hwwilliford@debevoise.com; Yeary, Michelle; PURDUE AKIN LIT; apreis@akingump.com

**Subject:** RE: Drs. Richard & Kathe Sackler MDL Deposition Transcripts

**Attachments:** Exhibit 8.pdf; Exhibit 5.pdf

Please see attached. Thanks.

### **Lindsey Cohan**

**Dechert LLP** 

+1 512 394 3027 Direct

lindsey.cohan@dechert.com dechert.com

**From:** Porter, Katherine [mailto:kporter@akingump.com]

Sent: Thursday, October 31, 2019 11:20 AM

To: Cohan, Lindsey <Lindsey.Cohan@dechert.com>

Cc: Hurley, Mitchell <mhurley@AkinGump.com>; Brauner, Sara <sbrauner@akingump.com>; Benedict, Kathryn S.

- <kathryn.benedict@davispolk.com>; LaFata, Paul <Paul.LaFata@dechert.com>; Rubin, Dylan S.
- <dylan.rubin@davispolk.com>; Pera, Michael <michael.pera@davispolk.com>; EXT eli.vonnegut@davispolk.com
- <eli.vonnegut@davispolk.com>; McClammy, James I. <james.mcclammy@davispolk.com>; Coleman, Hayden
- <Hayden.Coleman@dechert.com>; EXT mleventhal@jha.com <mleventhal@jha.com>; EXT hwwilliford@debevoise.com
- <hwwilliford@debevoise.com>; Yeary, Michelle <michelle.yeary@dechert.com>; PURDUE AKIN LIT
- <PURDUEAKINLIT@akingump.com>; Preis, Arik <apreis@akingump.com>

Subject: RE: Drs. Richard & Kathe Sackler MDL Deposition Transcripts

Thank you, Lindsey.

I think we are missing two exhibits still:

- Richard Sackler exhibit 5.
- Kathe Sackler exhibit 8.

#### **Katherine Porter**

Direct: <u>+1 212.872.7467</u> | Internal: <u>37467</u>

From: Cohan, Lindsey <Lindsey.Cohan@dechert.com>

**Sent:** Thursday, October 31, 2019 10:54 AM **To:** Porter, Katherine <kporter@akingump.com>

Cc: Hurley, Mitchell <mhurley@AkinGump.com>; Brauner, Sara <sbrauner@akingump.com>; Benedict, Kathryn S.

<kathryn.benedict@davispolk.com>; LaFata, Paul <Paul.LaFata@dechert.com>; Rubin, Dylan S.

<dylan.rubin@davispolk.com>; Pera, Michael <michael.pera@davispolk.com>; EXT eli.vonnegut@davispolk.com

<eli.vonnegut@davispolk.com>; McClammy, James I. <james.mcclammy@davispolk.com>; Coleman, Hayden

# UNREDACTE 109-2064945151 OUD 67D 2116094ES FINE (12/18/20 ONE INTEREST TO PROTECTIVE ORDER COMMUNICATIONS - TREAT (\$ COMMU

<Hayden.Coleman@dechert.com>; EXT mleventhal@jha.com <mleventhal@jha.com>; EXT hwwilliford@debevoise.com

<hwwilliford@debevoise.com>; Yeary, Michelle <michelle.yeary@dechert.com>; PURDUE AKIN LIT

<PURDUEAKINLIT@akingump.com>; Preis, Arik <apreis@akingump.com>

Subject: RE: Drs. Richard & Kathe Sackler MDL Deposition Transcripts

Katherine,

With apologies, I realized that the exhibits to the deposition transcripts that I previously sent were inadvertently omitted. They are available here: https://dechert.box.com/s/vo8gwun5gw1Imgu5a0d0cbwa47wldy7n

Exhibits 26 and 31 to Dr. Richard Sackler's deposition are the transcripts of the two prior depositions referenced on pp. 20-21 of his MDL testimony (the Kentucky and Endo matters). Please note that these exhibits were designated as confidential pursuant to the MDL protective order. In addition, exhibits 5, 6, 13, 14, 15, and 62 to Dr. Richard's deposition were also designated confidential.

Please let us know if there is anything else we can assist you with.

Best, Lindsey

### **Lindsey Cohan**

**Dechert LLP** +1 512 394 3027 Direct

lindsey.cohan@dechert.com dechert.com

**From:** Porter, Katherine [mailto:kporter@akingump.com]

Sent: Wednesday, October 30, 2019 7:18 PM

To: Cohan, Lindsey <Lindsey.Cohan@dechert.com>

Cc: Hurley, Mitchell <mhurley@AkinGump.com>; Brauner, Sara <sbrauner@akingump.com>; Benedict, Kathryn S.

<<u>kathryn.benedict@davispolk.com</u>>; LaFata, Paul <<u>Paul.LaFata@dechert.com</u>>; Rubin, Dylan S.

<dylan.rubin@davispolk.com>; Pera, Michael <michael.pera@davispolk.com>; EXT eli.vonnegut@davispolk.com

<eli.vonnegut@davispolk.com>; McClammy, James I. <james.mcclammy@davispolk.com>; Coleman, Hayden

<Hayden.Coleman@dechert.com>; EXT mleventhal@jha.com <mleventhal@jha.com>; EXT hwwilliford@debevoise.com

<a href="mailto:</a><a href="mailto://www.lifer.com">hwwilliford@debevoise.com</a>; Yeary, Michelle <a href="mailto://wichelle.yeary@dechert.com">hwwilliford@debevoise.com</a>; Yeary, Michelle <a href="mailto://wichelle.yeary@dechert.com">hwwilliford@debevoise.com</a>; PURDUE AKIN LIT

<PURDUEAKINLIT@akingump.com>; Preis, Arik <apreis@akingump.com>

Subject: RE: Drs. Richard & Kathe Sackler MDL Deposition Transcripts

Lindsey,

Thank you again for these. Richard Sackler's deposition transcript refers to other depositions as well (on pages 20 - 21). Could you please share those other deposition transcripts with us?

Thank you,

#### **Katherine Porter**

Direct: +1 212.872.7467 | Internal: 37467

From: Porter, Katherine <kporter@akingump.com>

Sent: Sunday, October 27, 2019 8:21 AM

To: Cohan, Lindsey <Lindsey.Cohan@dechert.com>

**Cc:** Hurley, Mitchell < <u>mhurley@AkinGump.com</u>>; Brauner, Sara < <u>sbrauner@akingump.com</u>>; Benedict, Kathryn S.

# UNREDACTE 109-2064945161 OUD 67D 2116094ES FINE (12/18/20 ONE INTERPROPRIES TO PROTECTIVE ORDER COMMUNICATIONS - TREAT (\$4457EST TO PROTECTIVE ORDER

- <a href="mailto:kathryn.benedict@davispolk.com">kathryn.benedict@davispolk.com</a>; LaFata, Paul <a href="mailto:Paul.LaFata@dechert.com">kathryn.benedict@davispolk.com</a>; Rubin, Dylan S.
- <dylan.rubin@davispolk.com>; Pera, Michael <michael.pera@davispolk.com>; EXT eli.vonnegut@davispolk.com
- <eli.vonnegut@davispolk.com>; McClammy, James I. <james.mcclammy@davispolk.com>; Coleman, Hayden
- <Hayden.Coleman@dechert.com>; EXT mleventhal@jha.com <mleventhal@jha.com>; EXT hwwilliford@debevoise.com

Subject: Re: Drs. Richard & Kathe Sackler MDL Deposition Transcripts

Thank you

Sent from my iPhone

On Oct 26, 2019, at 8:52 PM, Cohan, Lindsey <Lindsey.Cohan@dechert.com> wrote:

### \*\*EXTERNAL Email\*\*

All,

We understand that the UCC has requested any transcripts of Sackler family members. The only such transcripts are for Dr. Richard Sackler and Dr. Kathe Sackler – both of which were taken in the MDL. Attached are those transcripts, which are being provided subject to the MDL protective order previously executed by Akin. Please note that certain portions of these deposition transcripts have been designated confidential or highly confidential by Purdue in accordance with the provisions of the protective order.

Please let us know if you have any questions.

Best, Lindsey

**Lindsey Cohan** 

**Dechert LLP** +1 512 394 3027 Direct

<u>lindsey.cohan@dechert.com</u> <u>dechert.com</u>

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<2019-04-01 Sackler, Kathe Mini.pdf>

<2019-03-07 Sackler, Richard MINI.pdf>

<2019-03-08 Sackler, Richard MINI.pdf>

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